

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

RUSSELL GEISSLER, BERNARD BAGLEY,
AND WILLIE JAMES JACKSON,
individually and on behalf of others similarly
situated,

Plaintiff,

vs.

BRYAN P. STIRLING, Director of the South
Carolina Department of Corrections (SCDC), *in*
his official capacity; and **JOHN B. MCREE,**
M.D., Division Director of Health and
Professional Services for SCDC, *in his individual*
capacity,

Defendants.

Case No.: 4:17-cv-01746-MBS

DECLARATION OF
SAMUEL F. ARTHUR, III

I, Samuel F. Arthur, III, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am a shareholder of Aikens Bridges Elliott Tyler & Saleeby, PA located in Florence, South Carolina, and counsel for Defendants in the above-titled action.
2. On January 23, 2020, this Court granted preliminary approval to the Proposed Consent Decree for Chronic Hepatitis C Treatment, (ECF No. 178) (the “Consent Decree”) and attached Notice, (ECF No. 178-1). *See* ECF No. 183.
3. On February 3, 2020, I received confirmation from Defendant SCDC that the Notice had been posted in all the SCDC institutions on or before January 31, 2020, as required by the Consent Decree.

[Signature]

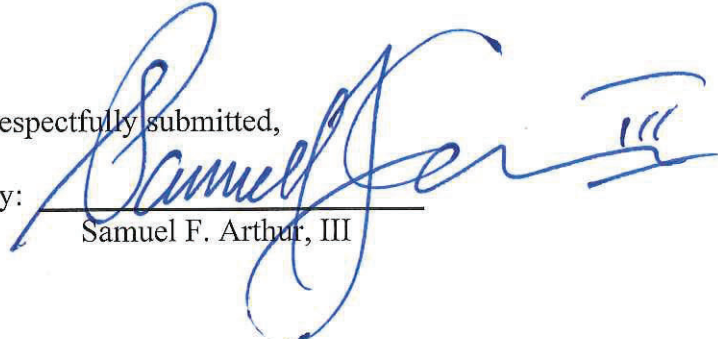
4. The Notice directs inmates and others to submit their comments or objections to the Consent Decree to Treatment@SCHepC.com and/or two listed attorneys representing plaintiffs and defendants.
5. I am the attorney listed in the Notice as representing the Defendants.
6. To date, I have received correspondence from multiple inmates inquiring about the status of inmates receiving treatment for Chronic Hepatitis C. My interpretation of the correspondence is that it appears to be in the form of an inquiry about treatment and not an objection to the Consent Decree. However, should the Court desire to review the correspondence, the undersigned counsel will provide the correspondence to the Court for review should it be deemed necessary.

I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Dated: May 18, 2020

Respectfully submitted,

By:


Samuel F. Arthur, III

BRYAN P. STIRLING, Director of the South Carolina Department of Corrections (SCDC), *in his official capacity*; and **JOHN B. MCREE, M.D.**, Division Director of Health and Professional Services for SCDC, *in his individual capacity*,

Defendants.

DECLARATION OF JAMES M. GRIFFIN

1. I am a principal of Griffin Davis in Columbia, South Carolina, and counsel for Plaintiffs in the above-titled action.
2. On January 23, 2020, this Court granted preliminary approval to the Proposed Consent Decree for Chronic Hepatitis C Treatment, (ECF No. 178) (the “Consent Decree”) and attached Notice, (ECF No. 178-1). *See* ECF No. 183.
3. The Notice directs inmates and others to submit their comments or objections to the Consent Decree to Treatment@SCHepC.com and/or two listed attorneys representing plaintiffs and defendants.
4. I am the attorney listed in the Notice as representing the Plaintiffs.

5. To date, while I have received inquiries about treatment or the settlement, I have received no objections to the Consent Decree.

I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Dated: May 18, 2020

Respectfully submitted,

By:


James M. Griffin

DECLARATION OF CHRISTOPHER J. BRYANT

1. I am an associate of Perkins Coie in Washington D.C. and counsel for Plaintiffs in the above-titled action.
2. On January 23, 2020, this Court granted preliminary approval to the Proposed Consent Decree for Chronic Hepatitis C Treatment, (ECF No. 178) (the “Consent Decree”) and attached Notice, (ECF No. 178-1). *See* ECF No. 183.
3. On January 26, 2020, I posted the Notice on www.SCHepC.com and created the Treatment@SCHepC.com email address.

4. On January 27, 2020, I provided all South Carolina Circuit Public Defenders with Copies of the Notice and a cover letter providing a brief overview of the Proposed Consent Decree, attached hereto as Exhibit A.
5. Inmates and others were directed by the Notice to submit any comments or objections to the Consent Decree to Treatment@SCHepC.com and/or two named attorneys.
6. I have monitored the Treatment email account and, to date, while it has received inquiries about treatment or the settlement, it has received no objections to the Consent Decree.

I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Dated: May 18, 2020

Respectfully submitted,

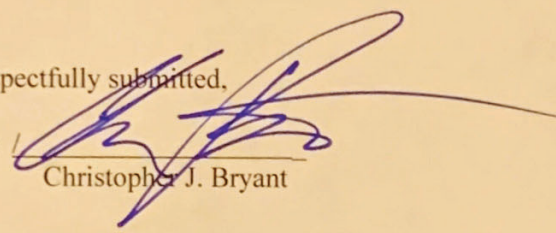
By: 
Christopher J. Bryant

Exhibit A to
Christopher J. Bryant
Declaration

Letter to Circuit Public Defenders Offices



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PerkinsCoie.com

January 27, 2020

Christopher J. Bryant
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VIA FAX

Circuit Public Defenders Offices

Re: Proposed Settlement: Hepatitis C Treatment for SCDC Inmates (*Geissler v. Stirling*)

Dear Chief Circuit Public Defender:

This fax is to inform you of a preliminarily approved class action settlement that, if approved, will provide Hepatitis C testing and treatment for inmates housed in South Carolina Department of Corrections prisons. The case is *Geissler v. Stirling*, 4:17-cv-1746-MBS, and the preliminarily approved settlement is attached to this letter.

We are providing each Circuit Public Defenders Office with this notice, as required by the Court. For more information, please visit www.SCHepC.com.

Very truly yours,

A handwritten signature in blue ink, appearing to be "CJ Bryant".

Christopher J. Bryant

CJB